

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

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Nicole Taylor Reed)
1148 Barley Dr.) DEBRA P. HACKETT, CLERK
Montgomery, AL 36111) U.S. DISTRICT COURT
) MIDDLE DISTRICT ALA
Plaintiff)
v.)
Big Lots Stores, Inc.)
300 Phillipi Road)
Columbus, Ohio 43228)

2:06cv380-T

COMPLAINT

1. Plaintiff resides at 1148 Barley Dr., Montgomery, Alabama 36111.
2. Defendant(s)' name(s): Big Lots Stores, Inc.

Location of offices(s) of the named defendant(s) where the cause of action occurred: Big Lots Stores, Inc., 2885 East South Blvd., Montgomery, Alabama.

Nature of defendant(s)' business: Retail merchandiser.

Approximate number of individuals employed by the defendant(s): over 500.

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. Section 2000e-5. Equitable and other relief are also sought under 42 U.S.C. Section 2000e-5(g).
4. The acts complained of in this suit concern:
 1. Failure to employ me.
 2. Termination of my employment.
 3. Failure to promote me.
 4. Other acts as specified below: Hostile environment, race and or sex.
5. Plaintiff is:
 - A. Presently employed by the defendant.
 Not presently employed by the defendant. The dates of employment were

12/12/02 - 01/10/06. Employment was terminated because:

- (1) Plaintiff was discharged.
- (2) Plaintiff was laid off.
- (3) Plaintiff left job voluntarily.

6. Defendant(s)' conduct is discriminatory with respect to the following:

- A. My race.
- B. My Religion.
- C. My sex.
- D. My national origin.
- E. Other, as specified below:

- 7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are): Mr. Billy Prigen, Mr. Jerry Culpepper, and Mr. Michael Williams.
- 8. The alleged discrimination occurred on or about March 28-30, 2005.
- 9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is as follows: As per my attached EEOC Charge, I was racially and sexually harassed and subjected to a hostile environment. After my complaints of being subjected to said hostile environment, I was retaliated against and subjected to further hostile environment and harassment. Finally I was laid off and never given an opportunity to be transferred to another location.
- 10. The alleged illegal activity took place at Big Lots, Inc. Store located at 2885 East South Blvd., Montgomery, Alabama.
- 11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s)' alleged discriminatory conduct on or about September 22, 2005. I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on February 6, 2006.
- 12. I seek the following relief:

- A. Recovery of back pay.
- B. Reinstatement to my former job, and any other relief as may be appropriate, including injunctive orders, damages, costs, and attorney's fees.

Date: 4/26/06


 Signature of Plaintiff
 Nicole Taylor Reed
 1148 Barley Dr.

Montgomery, Alabama 36111
(334) 281-1397
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